used in the NANP) would cause significant additional costs and severe customer dislocations.

The key to controlling adverse cost and customer impacts associated with numbers, is to expand the existing supply of numbers, while at the same time, to the extent feasible, retaining the existing number format and dialing patterns. INPA accomplishes this objective since the existing three digit NPA format is retained, as well as the ten-digit number structure.

B. There is no other viable alternative to INPA.

Several alternatives to INPA were considered in the past and rejected. They were not adopted because they did not increase the supply of numbers significantly, were too expensive, would disrupt the ability of customers to call any number without knowing where it is located and having to use special routing codes, and would cause significant disruptions to existing customer dialing patterns and make customer dialing longer and more complex.

IV. <u>CIC</u>.

A. The CIC expansion plan is the optimal solution for the expansion of CIC codes. It is an example of how industry forums can, with regulatory oversight, successfully manage difficult numbering problems.

An entity purchasing Feature Group B ("FG-B") or D ("FG-D") trunk side access service under a LEC switched access tariff must be assigned a CIC code so its switched access traffic can be routed to the proper trunk group and billed appropriately. The original format for CICs was planned to be two digits. In recognition of the potential growth in the need for codes, CICs were expanded to three digits in 1983, before they were placed into service. The three digit format was adopted to increase the number of codes available. The current CIC format is XXX, where X equals any 0-9 digit. The CIC is the last three digits of the customer dialed Carrier Access Code ("CAC"). For FG-B, the CAC is 950-0XXX or 950-1XXX, with the CIC being the XXX. The entity purchasing FG-B may chose whether the 1 or 0 digit precedes its CIC. The CAC for FG-D is 10XXX. Currently, individual CICs are assigned for use with both FG-B and FG-D, and the same CIC is not used by two different customers. Based upon the three digit format, there are 969 possible assignable CICs.

CICs were created to improve interconnection arrangements for Other Common Carriers ("OCCs"), which at the time were limited to Exchange Network Facilities for Interstate Access ("ENFIA"), known as Feature Group A ("FG-A"). CICs were then used to support FG-B (formerly ENFIA B and C) trunk side connections. CICs also were selected to meet the Equal Access Requirements of the MFJ (FG-D).

The NANPA inherited the responsibility for administration of CICs as a part of its NANPA responsibilities at the time of divestiture. CICs are administered by NANPA through guidelines developed through industry consensus at the Industry Carrier Compatibility Forum ("ICCF"). The ICCF is a public forum that is open to all industry members, including regulators. The Commission's staff is invited to and on occasion attends ICCF meetings. They also receive copies of ICCF agendas, minutes and guidelines. The Commission's staff also is consulted on all significant ICCF decisions.

At the time of the inception of CICs, only one code was assigned per entity. A second code was assigned to an international affiliate, if necessary. At its May, 1986 meeting, the ICCF decided that in order to accommodate varying entity structures and needs, entities could receive a total of three CICs, in addition to a single international code -- one primary and two supplemental. The ICCF also urged that supplemental codes be returned, if CIC assignments reach a predetermined threshold level of 700.[2]

In 1988, it became clear that the supply of CICs might eventually deplete. At that time, the industry agreed to address the issue by conducting several open CIC expansion workshops. These workshops were conducted in April and September of 1988. As a result of those sessions, it became clear that the only reasonable alternative was to expand the CIC format to four digits (XXXX), and by also breaking the existing relationship between FG-B and FG-D codes. The new format, along with the creation of two separate (FG-B and FG-D) pools of assignable CICs codes, will increase the current 969 available three-digit FG-B/D codes to 9,000 and 10,000 four-digit FG-B and FG-D CICs.

The proposal for four digit CICs was presented to and approved by the ICCF at its October, 1988 meeting. The ICCF directed the NANPA to expand CICs in two phases – FG-B and then FG-D CICs. The CIC expansions were initially scheduled for the second quarter of 1992 for FG-B and the first quarter of 1995 for FG-D. However, due to technical problems with the development of the software necessary to support the four-digit CICs by the switch vendors and other technical problems, the dates for the conversions were moved by ICCF at its March, 1991 meeting to the second quarter of 1994 for FG-B and the first quarter of 1997 for FG-D. Based on CIC assignment rates at that time, the conversion would still have occurred before the existing supply of three-digit CICs would exhaust.

However, late in 1990, the CIC assignment rate suddenly increased from around 8 per month to 12 per month and has continued at that higher

[2] Guidelines for Interexchange Customer's To Obtain A Carrier Identification Code (CIC) For Use With Feature Group B and/or D Access, ICCF, May, 1987.

rate. As a result, it has now become clear that the remaining supply of CICs may exhaust prior to the scheduled FG-B conversion date. As a result, the industry was notified by the NANPA that the date for the FG-B conversion was informally moved up to April, 1993, the projected date of CIC exhaust. At the request of the Commission, each BOC advised the Commission of its commitment to meet that date in November, 1991.

Pursuant to the 1987 ICCF approved guidelines, NANPA and the LECs redoubled their efforts to conserve and reclaim CICs. Pursuant to the 1987 ICCF guidelines, NANPA will no longer assign new secondary CICs. In addition, many CIC have fallen into disuse. As of November, 1991, NANPA began efforts to reclaim unused CICs. As a result of these efforts, 162 unused CICs have been identified and made available for reassignment. Eleven additional unused CICs also are in the reclamation process.

Also, due to mergers and acquisitions, some entities have acquired more than three CICs ("M&A CICs"). It has been anticipated that all entities would voluntarily return their M&A CICs without the need of formal Commission action. As of November, 1991, 52 M&A CICs have been identified and two have been recovered. NANPA's efforts to reclaim the remaining 52 M&A CICs have yet to achieve any concrete assurance that they will be returned. The Companies ask for the Commissions' continued informal support of NANPAs efforts and, if necessary, will file a petition asking the Commission to formally consider this matter.

As can be seen, the development of the four-digit CIC plan is a model of how the industry can resolve its own numbering needs with regulatory oversight and support.

V. Recovery of CIC and INPA Costs.

A. The NPA and CIC expansions are required to provide the numbers and codes necessary to provide switched and exchange services to all customers and carriers. The costs of the expansions should be recovered by LECs through rates.

NARUC asks for an Inquiry into whether numbering costs should be recovered through rates for specific services. The answer is self evident that LECs must be able to recover these substantial expansion costs through rates. However, the issue does not need to be investigated.

In considering recovery of CIC and INPA expansion costs, it must be kept in mind that numbers are required to provide all switched and exchange services and are used by all customers. For example, eighty-six (86%) of CO codes assigned by the Companies are supporting residence and business exchange line services. In addition, the demand for numbers and codes that gives rise to the need to expand INPA and CIC is coming from all customer who benefit from their expansion.[3]

LECs must have the ability to recover the costs of INPA and four-digit CIC expansions in rates for number, codes and services. For that reason, the costs of expanding the existing supply of CIC and NPA codes that are allocated to the interstate jurisdiction should receive "exogenous" treatment under price caps. The CIC and INPA costs allocated to the intrastate jurisdiction should be recovered through rates established by the Companies with the state regulators.

In its LEC Cap Orders, the Commission correctly recognized that "some cost changes triggered by administrative, legislation or judicial action beyond

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[3]For example, the Companies assigned 623 new CO Codes in 1990 and 1991. Of these codes 65% (408) were for exchange services, 35% (215) for Cellular and 10% (42) for paging. The exchange services included residential and business exchange lines, DID trunks, and Centrex lines.

the control of the carriers would not be reflected in the other components of the Price Cap Index". The Commission classified these costs as "exogenous" and found that they "should result in an adjustment to the Price Cap Index."[4] However, the Commission then ignored its own definition and denied exogenous treatment for equal access costs.[5]

In its LEC Price Cap Reconsideration Order, the Commission applied its equal access finding to the costs of CIC expansion and found that they likewise did not qualify for exogenous treatment.[6] However, the Commission did not rebut the parties' evidence that CIC expansion costs do meet the criteria for exogenous treatment.[7] The Commission rather declined to classify these costs as exogenous, because "the incentives exogenous cost treatment could create to inflate the amounts spent on equal access".[8] The Commission stated it wishes to create "incentives" to implement equal access "in as efficient a manner as possible, recognizing that it is the carrier that is capable of controlling costs."[9]

The Commission's decision ignores the fact that CIC expansion costs meet the Commission's criteria for classification as exogenous costs. They will be both significant and are not reflected in the Price Cap Index. In

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[4]In the Matter of Policy and Rules Concerning Rates for Dominant Carriers, CC Docket 87-313, Second Report and Order adopted September 19, 1991. ("LEC Price Cap Order") ¶ 266 and Order on Reconsideration, adopted April 9, 1991 ("LEC Price Cap Reconsideration Order") ¶ 58.

[5]Supra, ¶ 180 and ¶ 66.

[6]Supra, at ¶ 66.

[7]Supra.

[8]LEC Price Cap Order at ¶ 180, and LEC Price Cap Reconsideration Order at ¶ 66.

[9]Supra.

addition, they are "mandated" because they are required to provide authorized tariffed service and may be required by the MFJ Courts to provide non discriminatory equal access. As a result, these costs should be classified as exogenous unless the Commission orders that when the existing supply of CIC exhaust, LECs are not required to provide new CICs. Even if such an order is made, it is possible that the MFJ Court could still mandate the CIC expansion.

The Commission's decision also was premature and was not based upon a full and complete record on CICs. At the time of the Commission decision, the CIC conversion was still being planned and developed and the costs of the conversion had not yet been quantified. Moreover, the CIC cost recovery issue was not addressed by many parties and was mentioned in passing as a part of the Commission's decision on equal access costs. The Companies request that the Commission take a fresh look at the classification of CIC expansion costs when they are incurred and it has the benefit of a full record on the subject.

The inability to recover the CIC investments and expenses could be a serious blow to the financial health of the LECs. The result would not foster efficiency, but would rather stifle infrastructure investments necessary to respond to customer service needs. For the same reason, the Commission should likewise consider the classification of the costs of the INPA conversion, when they are incurred, and should conclude that they are exogenous because they are mandatory to provide tariffed services, are significant and are not reflected in the Price Cap Index.

VI. Number and Code Assignment Guidelines.

A. The Companies already assign CO codes on a reasonable nondiscriminatory basis. Voluntary general guidelines are being developed under the aegis of the Commission.

NARUC also asks for an Inquiry into equitable plans for assigning of codes among LECs, interexchange carriers, enhanced service provides, cellular carriers and PSC providers. However, such an Inquiry is unnecessary because it would merely duplicate existing industry efforts to develop voluntary general CO code assignment guidelines, currently is being coordinated by the NANPA under the aegis of the Commission and scheduled for completion on July 1, 1992.

In addition, the Ameritech Operating Companies already license CO codes and numbers on a reasonable nondiscriminatory basis to any entity demonstrating a need. Codes and numbers are assigned subject to any applicable state license, regulatory or tariff requirements and charges. CO codes are licensed by the Companies to identify a specific geographic location on the network, which is reachable from any point on the public switched network.

Furthermore, CO code assignment is a state issue governed by state needs, rules and tariff requirements, which is not the appropriate subject for a federal Inquiry. To the extent that a party may feel that the Companies are not following their policy of nondiscriminatory assignment, it can and should bring the issue to the state regulatory commission involved.

VII. Conservation and Reclamation.

A. The NANPA and the Companies are already utilizing appropriate number and code conservation and reclamation measures.

NARUC also asks the Commission to examine methods to conserve numbers and codes. However, a general examination is not required. The Companies' have a long standing policy of utilizing any and all reasonable measures within their control to help ensure the efficient utilization of numbers and codes, including the reclamation of excess, underutilized and abandoned codes and numbers. In addition, both the NANPA and the Companies already have very effective plans to conserve and reclaim excess and underutilized numbers and codes. Their efforts have been generally very successful and are significantly delaying the exhaustion of codes and numbers.

The accelerating demand for numbers -- not inefficiency and waste -- is the primary drivers behind the need for NPA and CIC expansion. As long as the industry will respond to customer and carrier demands for numbers, there will be a need to expand the existing supply of codes, regardless of the conservation and reclamation efforts. The correct role for conservation is to prevent waste and promote efficiency in order to delay exhausts and conserve resources to the extent feasible.

The Companies agree that conservation efforts are critical and deserve the support -- both informally and formally, if necessary -- of their regulators. In particular, conservation is a key component of the Companies' plan to prevent or minimize any code exhaust before expansions can occur. However, a formal Inquiry is not required because those efforts are currently on going and the Companies are hopeful that they will be successful without the need of formal regulatory action. However, the Companies are in contact with both the Commission and state regulators and are reviewing their conservation and reclamation efforts with them and are interested in any suggestion that may help conserve or reclaim codes. They also will seek the formal support of both the Commission and state regulators, as required, to compel the industry to comply with reasonable conservation and reclamation measures.

The Companies would like to point out the current highly successful efforts to conserve and reclaim CO codes and the implementation of interchangeable CO ("NXX") codes to forestall exhaust of NPAs in their Region. When an NPA begins to exhaust, the Companies implement stringent CO code recovery and conservation measures and deploy interchangeable CO codes. This policy is designed to defer the cost and customer inconvenience of an NPA split for as long as reasonably possible, thereby holding NPA splits to a minimum, and promoting network efficiency.

The conservation and recovery measures adopted by the Companies, include:

1. Identification and recovery of underutilized codes.
2. Consolidation of test codes.
3. Recovery of special purpose codes.
4. Where feasible, sharing of codes between switching machines and central offices.
5. More efficiently utilize of theoretical codes.
6. Implementation of interchangeable CO codes thereby increasing the available pool of codes from 640 to 792 per NPA.

The success of these measures is demonstrated in the 313 NPA in Detroit. The net effect of their use was to defer the date of the split of the 313 NPA for four years. This results were achieved in the face of an accelerating demand for codes and numbers. They also were accomplished without an Inquiry and may not have been possible, if Michigan Bell could not have acted until it received an order, after a lengthy proceeding.

VIII. Reports.

A. Existing Monitoring Reports are Adequate.

NARUC asks for an inquiry into whether additional numbering monitoring reports are required. However, any party proposing an Inquiry into this area, should be required to demonstrate that there is a deficiency in the existing report that warrants review. This NARUC has failed to do. Rather, it simply speculates that a problem might exist.

The Companies believe that an Inquiry into the need for monitoring reports is not necessary. Detailed and complete reports are already filed, which enable regulators to meet their oversight and policy responsibilities. In fact, one of these reports was revised in 1990 to meet the Commission's requirements. In addition, the Companies are committed to working with the industry and the regulators in resolving numbering matters and will cooperate with regulators to supply additional information necessary to address changing needs and concerns, as they arise.

There are two separate numbering reports in place today to assist the NANPA and the Commission in tracking utilization of CO and CIC codes. The CIC Quarterly Access/Usage Report has been providing CIC usage information since the mid-1980s. In 1990, the CIC report was reviewed by ICCF, NANPA and the Commission's staff, who recommended that the existing CIC reports be consolidated into one quarterly report, which provided additions, deletions and overall utilization data on assigned CIC codes. This information was added to assist the Commission access management needs. The CIC reports are deemed to be non-confidential and are available to the industry from the Commission or NANPA.

The second report is the Central Office Code Utilization Survey ("COCUS"). The COCUS is compiled by NANPA directly from LEC input and provides an annual overview and projections of CO code utilization and projections in each NPA in World Zone 1. Monitoring the growth rates and trends helps to forecast the exhaust of individual NPAs and the date when the existing supply of NPAs will deplete. COCUS also has been used since the mid-1980s to anticipate the need for and to schedule the various conservation and relief measures.

IX. The NANPA.

A. The RBOCs derive no competitive advantage from having NANPA in Bellcore.

NARUC asks whether the BOCs can derive a competitive advantage from NANPA being a part of Bellcore. The answer is no. Such an advantage has not and cannot arise in practice. The proposition that RBOCs could engage in self-dealing through NANPA without detection is not creditable. NANPA operates in a "fish bowl", resolving policy and major technical issues based on input from industry forums, such as ICCF, which include representatives from all facets of the industry. NANPA also operates under regulatory oversight of the Commission's staff. In the unlikely event that some type of self-dealing ever did occur, it would be easily detected by the industry participants and the Commission's staff.

In addition, Bellcore is the only logical party to act as the NANPA. Bellcore is the party that was assigned this responsibility under the Plan of Reorganization (POR) under the Modified Final Judgment ("MFJ") and has the expertise necessary to manage the NANP and to resolve efficiently and correctly very complex and highly technical numbering issues. Bellcore also is the proper home for the NANPA function since the resolution of numbering issues often requires an in depth knowledge of the capabilities and requirements of the public switched network. This is information and experience would be difficult and expensive to duplicate in any other entity.

X. The Industry Forum Process.

A. The existing industry forum process should be retained.

The Companies believe that the existing process of resolving numbering matters based on input from industry forums under regulatory oversight has served the nation well and should be retained. The NPA and CIC expansion plans discussed throughout these comments provide ample proof that this type of process can work and can be used as the model for the handling of future numbering issues.

The Companies would like to present another recent instance where an informal process is being successfully used -- this time at the state level. The example involves the approach used by the Companies and their state regulators to manage the splitting of an NPA. The specific examples used to illustrate the point are the splits of the 312 NPA in Chicago, and the upcoming split of the 313 NPA in Detroit. However, similar processes will be used in the other states.

It was decided that the split of the 313 NPA should be managed through a Citizens Panel, which would set the boundaries of the new NPAs. The Citizens Panel includes representatives from the Michigan Public Service Commission ("MPSC") and the county governments involved. As part of this effort, the Panel is conducting an extensive survey of all stakeholders. So far, the process is working very well, and should ensure that the split responds to customers needs and desires, while hopefully avoiding the need for contested a case and regulatory fiat.

The 312 NPA was split in 1990. Beginning in January, 1989, informal discussions began between the Illinois Commerce Commission and Illinois Bell. Extensive discussions and sessions occurred throughout 1989, which focused on every aspect of the split, including the consumer information and education packages. The result was a massive and highly successful customer education program that significantly reduced customer confusion and inconvenience.

As these examples demonstrate, informal industry processes do work to produce plans that respond to and balance the needs of all stakeholders. More importantly, these informal processes resolve complex and technical issues with minimum cost and disruption to the largest stakeholder -- the local customers.

XI. Conclusion.

In the reasons discussed above, a general Inquiry would be unnecessary, duplicative and counter productive. NARUC's Petition should be denied.

Respectfully submitted,

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Date: December 20, 1991

<u>CERTIFICATE OF SERVICE</u>

I, Diana M. Lucas, do hereby certify that copies of the foregoing opposition of the Ameritech Operating Company were sent via first class mail, postage paid, on this the 20th day of December 1991:

By: Diana M. Lucas
Diana M. Lucas

DATED: December 20, 1991

Before the
Federal Communications Commission
Washington, D. C. 20554

In the Matter of	)	
	)	DA 91-1307
Administration of the North	)	
American Numbering Plan	)	

Reply Comments of the
The Ameritech Operating Companies

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Date: January 17, 1992

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Reply Comments of the
The Ameritech Operating Companies

I. Introduction and Summary

The Ameritech Operating Companies[1] file their reply comments in opposition to the request for a general inquiry into the administration of the North American Numbering Plan ("NANP") filed by the National Association of Regulatory Utility Commissioners ("NARUC").

The Companies believe that a general inquiry into the NANP at this time is unwarranted and would be counter productive for several reasons. The existing informal industry forum process is working well and is resolving numbering issues as they arise through industry consensus agreements without the need of regulatory intervention. Most of the issues raised by the NARUC Petition and the comments arise from the expansion of Carrier Identification Codes ("CIC") and Numbering Plan Area ("NPA") codes [called "INPA"], which already have been resolved. An inquiry into the CIC and INPA expansion plans at this late date could disrupt the implementation of the expansion of the supply of these codes before they exhaust. The remaining issues raised by NARUC and the comments are either resolved or

[1] The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

are being addressed in international standards bodies and national industry forums, under regulatory oversight.

In their comments, the Companies fully presented the reasons why a general inquiry into numbering is not appropriate. They will not repeat those explanations here. Rather, they will establish that the comments of the other parties fail to support the contention that there is a need for a general inquiry. To the contrary, the comments present additional compelling reasons why a general inquiry should not be conducted.

Twenty-six parties filed comments in this proceeding, including six Regional Bell Operating Companies ("RBOCs"),[2] four other local exchange carriers ("LECs"),[3] two alternate access providers,[4] four interexchange carriers ("ICs"),[5] four cellular/mobile and paging carriers ("Cellular/Mobile"),[6] two state regulators,[7] two LEC industry associations,[8] the North American Numbering Plan Administrator ("NANPA"), Telecom Canada and Unitel.

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[2]The Companies, BellSouth Corporation ("BellSouth"), NYNEX Telephone Companies ("NYNEX"), Pacific Bell and Nevada Bell ("Pacific"), Southwestern Bell Telephone Company ("SWBT") and U S West Communications, Inc. ("U S West").

[3]Centel Corporation ("Centel"), GTE Service Corporation ("GTE"), Rochester Telephone Corporation ("Rochester"), and United Telecommunications, Inc. ("United").

[4]Metropolitan Fiber Systems, Inc. ("MFS") and Teleport Communications Group ("Teleport").

[5]Allnet Communication Services, Inc. ("Allnet"), American Telephone and Telegraph Company ("AT&T"), MCI Communications Corporation ("MCI"), and United.

[6]GTE, McCaw Cellular Communications, Inc. ("McCaw"), Rogers Centel, Inc. ("Centel"), Telocator.

[7]Public Service Commission of the District of Columbia ("DC PSC") and Florida Public Service Commission ("Florida PSC").

II. Issues That Have Been Resolved

The comments generally address numbering issues and concerns of particular interest to each entity and industry segment, with the RBOCs and GTE generally opposing a general inquiry[9] and the other industry segments seeking review of specific issues that would further their interests. However, when viewed as a whole, the comments establish that most of the issues raised by NARUC have been correctly resolved and need not be re-reviewed.

A. The CIC and INPA Expansion Plans Are Settled.

The comments demonstrate that CIC and INPA expansion plans already have been adopted after extensive industry discussion and implementation should continue without further review or delay, for several reasons.

First, the four-digit CIC and INPA expansions plans are public knowledge, have been thoroughly discussed with the Commission's staff and in industry forums, and enjoy industry consensus support.[10] More importantly, the plans are the optimal solutions to the pending exhaustion of telephone numbers and codes. While several parties support an inquiry, few identified the CIC and INPA plans as an appropriate subject of that inquiry.[11]

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[8]National Telephone Cooperative Association ("NTCA") and United States Telephone Associations ("USTA").

[9]BellSouth supports a limited inquiry.

[10]See, NANPA 3; NYNEX 2-3; SWBT 1-2; GTE 2 and 4-5; and United 2-3.

[11]For example, AT&T, Allnet, DC PSC, Florida PSC, McCaw, United, and Teleport, all support a general inquiry, but did not specifically identify the CIC and INPA plans as requiring review.

Even those parties who specifically mentioned the CIC and INPA plans, do not propose an alternative plan or represent that the current industry plans are flawed or unreasonable.[12]

Second, no party presented any evidence refuting the Companies' conclusion that the CIC and INPA conversion dates cannot be deferred without creating a risk of a hiatus. Rather, the comments clearly substantiate that the CICs and NPAs are exhausting and timely relief is required to avoid an exhaust.[13]

Third, no party advocates a temporary or permanent shortage of telephone numbers and codes so that reconsideration of the expansion plans can take place. Rather, efforts to avoid a hiatus should be made.[14] Thus, the Commission should take no action that could interrupt the implementation of the expansion of the supply of numbers and codes.

Fourth, the Companies point out in their comments that the CIC and INPA expansion plans are massive undertakings that must be completed in a very short period of time. Meeting the current conversion dates is a formidable task that can be accomplished only through the successful and timely completion of the multitude of intricate interrelated steps that must be taken by the entire industry to implement these plans. Even then, a shortage can be avoided only if the current conservation and reclamation efforts are successful and no unforeseen increase in demand occurs. If all steps occur as planned, implementation of the plans in time to avoid a hiatus is challenging, but achievable.

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[12]See, for example, BellSouth 2-4; MCI 7-8; NTCA 2; and Rochester 2.

[13]The Companies 2-3; NANPA 7-8; NYNEX 3; GTE 2; and SWBT 4.

[14]See, NYNEX 3; Pacific 4; GTE 2; USTA 5; and NANPA 8.

The comments of the other RBOCs and LECs confirm that the Companies are not alone in that delays in the installation of equipment, facilities, software and translations in their network necessary to support INPA and CIC would jeopardize the planned conversion dates, and would lead to an hiatus.[15] As several parties pointed out, due to long design, planning, ordering and testing intervals, the plans must be finalized well in advance of the conversion dates.[16] For that reason, several RBOCs and LECs joined the Companies in asking that the Commission not make changes to the CIC and INPA expansion plans or take any other action which could introduce uncertainty into the implementation process. Any such action could cause delay in the availability of new numbers.[17]

B. The Industry is Already Utilizing Reasonable Conservation Measures.

The comments confirm that there is no need for a general inquiry into the conservation of numbers and codes. The parties who address conservation all support it in principle.[18] Moreover, no party opposed the concept that effective conservation of codes and numbers is essential to avoid undue customer disruptions and costs resulting from NPA splits and code expansions. Moreover, the current conservation plans are sufficient (if complied with) to meet the objective of deferring number and code exhausts while meeting customer service expectations. Again, no party presented any

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[15]NANPA 8; NYNEX 6; Pacific 4; BellSouth 9; GTE 2; and USTA 5.

[16]NANPA 8-9; NYNEX 6; and Pacific 4.

[17]The Companies 2-3; NYNEX 6; Pacific 5; GTE 3; NANPA 9; and USTA 5.

[18]See, USTA 5; GTE 8-9; and MCI 6.

contrary evidence. Rather, one party simply speculates that there may be a need "for relaxing or tightening the restrictions on numbers",[19] and another asserts that the RBOCs assign codes "with no assurances to the industry that they are being used in an effective manner."[20] However, this unsupported speculation hardly is a basis for an inquiry.

Three parties specifically address the burden caused by NPA splits and revisions in code formats, but then complain when conservation measures are applied to them.[21] Apparently, they want it both ways. However, in order for conservation to be effective, it must apply uniformly to all carriers and customers. No party has presented reasonable grounds for an exception for themselves.

For example, two Cellular/Mobile carriers correctly note that NPA splits pose a particular burden for them.[22] The Companies agree and seek to minimize NPA splits to the extent feasible consistent with meeting the reasonable service needs of customers and carriers. In order to minimize the burden of NPA splits, the Companies have implemented the comprehensive CO code and telephone number conservation measures discussed in their comments.[23]

Ironically, these same Cellular/Mobile carriers complain when they are asked to cooperate with measures designed to conserve telephone numbers

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[19]DC PSC 3.

[20]MCI 6.

[21]MCI 6; McCaw 4; and 8-9; and Telocator 5-6.

[22]McCaw 8-9; and Telocator 5-6.

[23]See, 16-17.

and CO codes. These measures include the provision of code utilization data, and the meeting of certain minimum utilization levels before additional codes are assigned.[24]

Cellular/Mobile carriers do create a significant demand for CO codes and, in some instances, in order to avoid a premature exhaustion of NPAs, the Companies have taken reasonable steps to see that additional CO codes are not assigned to these carriers until actually needed. Utilization information supplied by these carriers is treated as proprietary. Moreover, allegations of discrimination are groundless, since utilization requirements are uniformly applied within each company for all carriers and telephone companies, including the Companies themselves.

The same Cellular/Mobile carriers also state that in order to minimize their burden, they should receive advance notice of NPA splits.[25] The Companies again agree and have adopted a policy of notifying Cellular/Mobile operations personnel of NPA splits long before the planned split date, so they have sufficient time to accommodate the change. For example, Illinois Bell notified its Cellular/Mobile carriers of the split of the 312 NPA over two years prior to the split and well in advance of the public announcement of the split.

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[24]See, McCaw 8-9; and Telocator 5-6. These carriers also complain that some LECs require them to share underutilized codes. The Companies have never required cellular or mobile carriers to share codes, and, therefore, will not address the validity of this practice.

[25]McCaw 5-6; and Telocator 6.

C. CO Codes are Assigned on a Reasonable Nondiscriminatory Basis.

McCaw and Telocator allege that some unidentified RBOCs are engaging in unreasonable and unfair CO code assignment practices.[26] These allegations are without merit.

McCaw and Telocator specifically assert that they are subject to discriminatory treatment because their applications for CO codes are received by a different group within the RBOCs from the one that handles requests from telephone companies.[27] While it is true that Cellular/Mobile carrier CO code applications to the Companies are received by specialists for that industry, it is not true that discrimination results. In the Companies' experience, customers and carriers are best served if they deal with specialists trained to work with their industry, and those specialists coordinate their service requests within the company. However, in each of the Companies, once a CO code application is received, it is processed on the same basis as all other requests.

McCaw, also complains that it must pay "exorbitant" charges for CO codes.[28] However, the rates charged by the Companies for codes are either specified in tariffs or established in contracts between the Cellular/Mobile carrier and the Companies. The rates established by the Companies in contracts are within the range of the corresponding tariff rates in the other states. In all cases, the rates are modest and reasonable. This proceeding is not an appropriate forum to review specific rate levels.

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[26]McCaw 8-9, Telocator 5-6.

[27]Supra.

[28]McCaw 7.